

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
Plaintiffs,)	
)	C.A. No. 20-613 (LPS)
v.)	
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendant.)	

**PLAINTIFFS THOMSON REUTERS ENTERPRISE CENTRE GMBH AND
WEST PUBLISHING CORPORATION'S FIRST SET OF
INTERROGATORIES TO DEFENDANT ROSS INTELLIGENCE INC.**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26 and 33 and the Local Rules of the United States District Court for the District of Delaware (the "Local Rules" and each a "Local Rule"), Plaintiffs Thomson Reuters Enterprise Centre GmbH ("Thomson Reuters") and West Publishing Corporation ("West") (collectively "Plaintiffs"), hereby request that Defendant ROSS Intelligence Inc. ("ROSS" or "You") answer, separately and fully in writing under oath, the following Interrogatories ("Interrogatories" and each an "Interrogatory"), and serve such answers upon counsel for Plaintiffs, no later than thirty (30) days after service of these Interrogatories.

DEFINITIONS

Unless otherwise defined, all words and phrases used herein shall be accorded their usual meaning and shall be interpreted in their common, ordinary sense. As used in the Interrogatories, the words set forth below shall be defined as follows:

1. The terms "COMMUNICATED" and "COMMUNICATION(S)" should be interpreted in their broadest sense to include without limitation all oral or written

INTERROGATORY NO. 10:

DESCRIBE each iteration of the ROSS PLATFORM, including without limitation how its TECHNICAL FUNCTIONING changed from its first iteration to its last iteration.

INTERROGATORY NO. 11:

DESCRIBE the complete factual and legal basis for ROSS's belief that it is not liable for copyright infringement, whether direct or indirect, including without limitation the complete factual and legal basis for each affirmative defense ROSS asserts in this LITIGATION.

INTERROGATORY NO. 12:

DESCRIBE the complete factual and legal basis for ROSS's belief that it is not liable for tortious interference with contract, including without limitation the complete factual and legal basis for each affirmative defense ROSS asserts in this LITIGATION.

INTERROGATORY NO. 13:

IDENTIFY each PERSON, other than counsel, who was consulted or who provided information or documents in connection with YOUR response to each of these Interrogatories.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Dale M. Cendali

OF COUNSEL:

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Megan McKeown
KIRKLAND & ELLIS LLP
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Houston, TX 77002
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May 3, 2021

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Michael J. Flynn (#5333)
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mflynn@morrisnichols.com

*Attorneys for Plaintiffs Thomson Reuters
Enterprise Center GmbH and West Publishing
Corporation*

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	C.A. No. 20-613-LPS
)	
Plaintiffs/Counterdefendants,)	JURY TRIAL DEMANDED
)	
v.)	HIGHLY CONFIDENTIAL –
)	ATTORNEYS’ EYES ONLY
ROSS INTELLIGENCE INC.,)	
)	
Defendants/Counterclaimant.)	

**DEFENDANT AND COUNTERCLAIMANT ROSS INTELLIGENCE INC.’S
RESPONSE TO PLAINTIFFS’ FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware (“the Local Rules”), Defendant/Counterclaimant ROSS Intelligence Inc. (“ROSS”) hereby responds the First Set of Interrogatories to ROSS served by Plaintiffs Thomson Reuters Enterprise Centre Gmbh and West Publishing Co. (collectively, “Plaintiffs”).

These responses are made solely for the purpose of this litigation. Each response is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and to any and all other objections on any grounds that would require the exclusion of any statements contained herein if such interrogatories were asked of, or statements contained herein were made by, a witness present and testifying in court, and all such objections are expressly reserved and may be asserted at the time of trial.

ROSS’s responses are based upon information presently available to and located by ROSS. ROSS has not completed its investigation of the facts relating to this case, discovery in this action, or its preparation for trial. The responses given are intended to be without prejudice to ROSS’s

Bar Index	Relative Length (approximate percentage of longest bar)
1	85%
2	100%
3	92%
4	100%
5	98%
6	97%
7	40%
8	100%
9	98%
10	98%
11	100%
12	100%
13	100%
14	78%

Interrogatory No. 12:

DESCRIBE the complete factual and legal basis for ROSS's belief that it is not liable for tortious interference with contract, including without limitation the complete factual and legal basis for each affirmative defense ROSS asserts in this LITIGATION.

[illegible]

Interrogatory No. 13:

[REDACTED]

[REDACTED]

[REDACTED]

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Gabriel M. Ramsey
Warrington Parker
Kayvan M. Ghaffari
Jacob Canter
CROWELL & MORING LLP
3 Embarcadero Center, 26th Floor
San Francisco, CA 94111
Tel: (415) 986-2800

Mark A. Klapow
Lisa Kimmel
Joshua M. Rychlinski
Crinesha B. Berry
CROWELL & MORING LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004
Tel: (202) 624-2500

Dated: July 2, 2021
7285357 / 50241

By: /s/ Stephanie E. O'Byrne
David E. Moore (#3983)
Stephanie E. O'Byrne (#4446)
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dmoore@potteranderson.com
sobyne@potteranderson.com

*Attorneys for Defendant/Counterclaimant
ROSS Intelligence, Inc.*

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	C.A. No. 20-613-LPS
)	
Plaintiffs/Counterdefendants,)	JURY TRIAL DEMANDED
)	
v.)	HIGHLY CONFIDENTIAL –
)	ATTORNEYS’ EYES ONLY
ROSS INTELLIGENCE INC.,)	
)	
Defendants/Counterclaimant.)	

**DEFENDANT AND COUNTERCLAIMANT ROSS INTELLIGENCE INC.’S
SUPPLEMENTAL RESPONSES AND OBJECTIONS TO PLAINTIFFS’
FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware (“the Local Rules”), Defendant/Counterclaimant ROSS Intelligence Inc. (“ROSS”) hereby supplements its response and objections to the First Set of Interrogatories to ROSS served by Plaintiffs Thomson Reuters Enterprise Centre Gmbh and West Publishing Co. (collectively, “Plaintiffs”) on May 12, 2021.

These responses are made solely for the purpose of this litigation. Each response is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and to any and all other objections on any grounds that would require the exclusion of any statements contained herein if such interrogatories were asked of, or statements contained herein were made by, a witness present and testifying in court, and all such objections are expressly reserved and may be asserted at the time of trial.

ROSS’s responses are based upon information presently available to and located by ROSS. ROSS has not completed its investigation of the facts relating to this case, discovery in this action, or its preparation for trial. The responses given are intended to be without prejudice to ROSS’s

[REDACTED]

[REDACTED]

Interrogatory No. 12:

DESCRIBE the complete factual and legal basis for ROSS's belief that it is not liable for tortious interference with contract, including without limitation the complete factual and legal basis for each affirmative defense ROSS asserts in this LITIGATION.

[REDACTED]

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[REDACTED]

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[REDACTED]

Interrogatory No. 13:

IDENTIFY each PERSON, other than counsel, who was consulted or who provided information or documents in connection with YOUR response to each of these Interrogatories.

[REDACTED]

[REDACTED]

[REDACTED]

OF COUNSEL:

Gabriel M. Ramsey
Warrington Parker
Kayvan M. Ghaffari
Jacob Canter
CROWELL & MORING LLP
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San Francisco, CA 94111
Tel: (415) 986-2800

Crinesha B. Berry
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1001 Pennsylvania Avenue, NW
Washington, DC 20004
Tel: (202) 624-2500

Dated: January 11, 2022
7553340 / 50241

POTTER ANDERSON & CORROON LLP

By: /s/ David E. Moore
David E. Moore (#3983)
Bindu A. Palapura (#5370)
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dmoore@potteranderson.com
bpalapura@potteranderson.com

*Attorneys for Defendant/Counterclaimant
ROSS Intelligence, Inc.*

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST PUBLISHING
CORPORATION,

Plaintiffs and
Counterdefendants,

v.

ROSS INTELLIGENCE INC.,

Defendant and
Counterclaimant.

C.A. No. 20-613 (LPS)

HIGHLY CONFIDENTIAL -
ATTORNEYS' EYES ONLY

**PLAINTIFFS AND COUNTERDEFENDANTS THOMSON REUTERS
ENTERPRISE CENTRE GMBH AND WEST PUBLISHING CORPORATION'S
RESPONSES AND OBJECTIONS TO DEFENDANT AND COUNTERCLAIMANT
ROSS INTELLIGENCE INC.'S SECOND SET OF INTERROGATORIES (NO. 13)**

Pursuant to Federal Rules of Civil Procedure 26 and 33 and the Local Rules of the United States District Court for the District of Delaware (the "Local Rules" and each a "Local Rule"), Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH ("Thomson Reuters") and West Publishing Corporation ("West") (collectively "Plaintiffs"), hereby respond to Defendant and Counterclaimant ROSS Intelligence Inc.'s ("Defendant") Second Set of Interrogatories, served on January 7, 2022 (the "Second Set of Interrogatories" and each individually, an "Interrogatory") in the above-captioned action ("Action") as follows:

RESPONSES AND OBJECTIONS TO INTERROGATORIES

INTERROGATORY NO. 13:

State all facts RELATING TO YOUR contention that ROSS tortuously interfered with the contractual relationship between WEST and LEGALEASE as alleged in Paragraphs 49-53 of the COMPLAINT.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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*** BEGIN HIGHLY CONFIDENTIAL — ATTORNEYS' EYES ONLY DESIGNATION ***

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/s/ Michael J. Flynn

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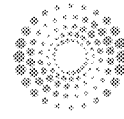
February 7, 2022

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*Attorneys for Plaintiffs and
Counterdefendants Thomson Reuters
Enterprise Center GmbH and West Publishing
Corporation*

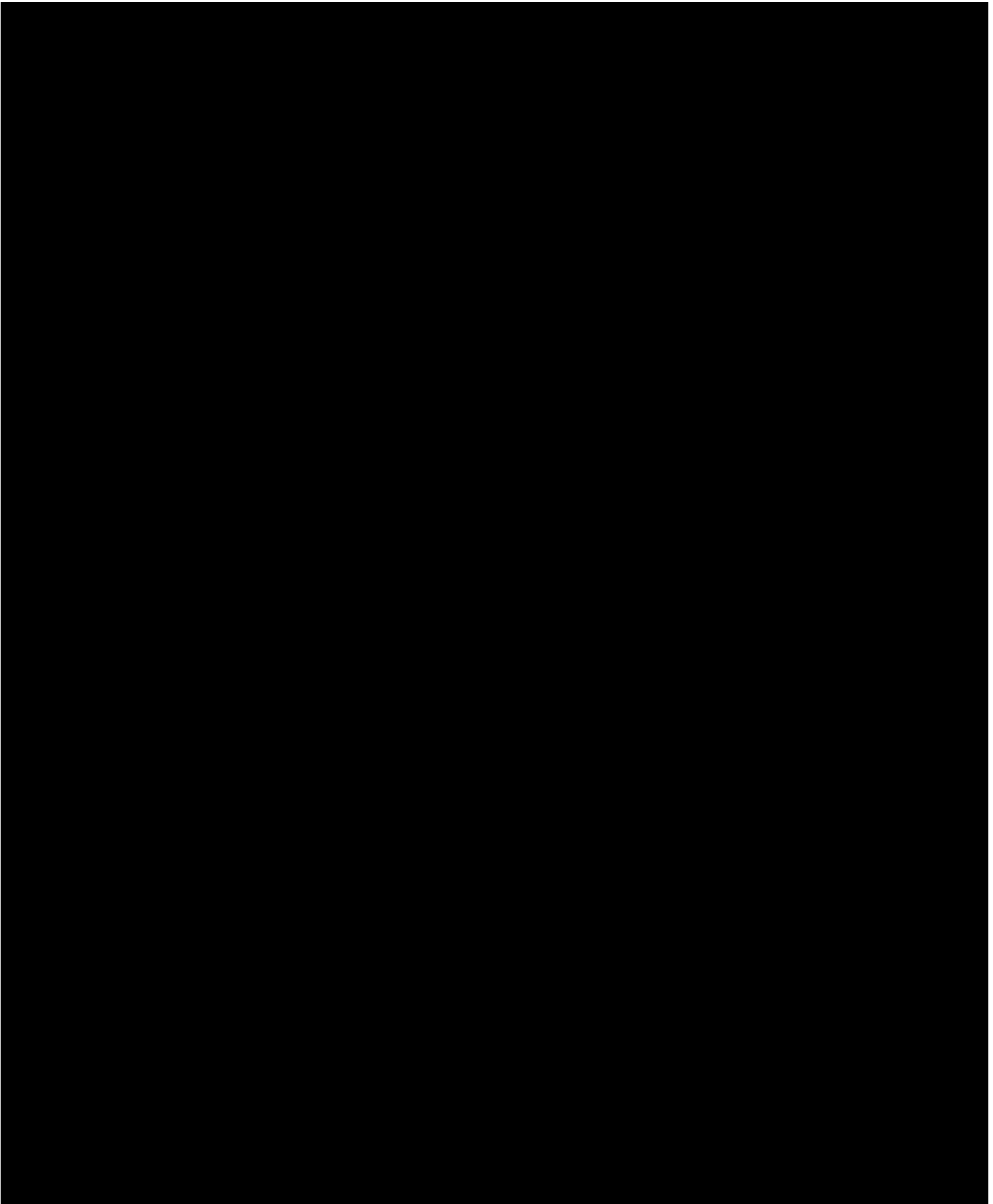
EXHIBIT E

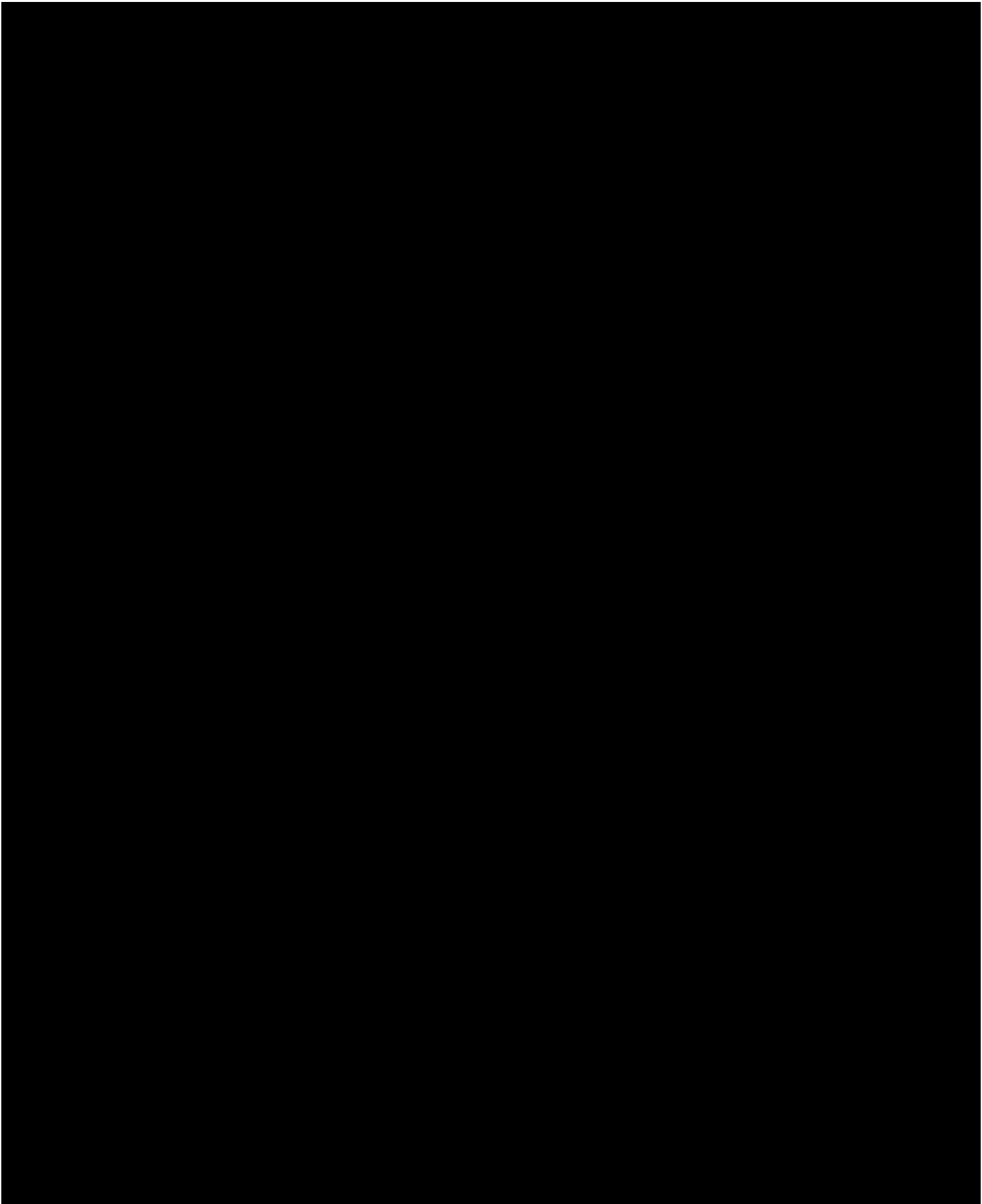
GENERAL TERMS AND CONDITIONS



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EXHIBIT F

From: Thomas Hamilton <thomas@rossintelligence.com>
Sent: Fri, 25 Sep 2015 13:54:06 -0700 (PDT)
To: Andrew Arruda <andrew@rossintelligence.com>; Jimoh Ovbiagele <jimoh@rossintelligence.com>
Subject: Fwd: Re: Ross Intelligence - Demo Practice Point
Attachments: image003.jpg;image003.jpg


----- Forwarded message -----

From: <melissa.pritchard@thomsonreuters.com>
Date: 25 Sep 2015 13:13
Subject: Re: Ross Intelligence - Demo Practice Point
To: <thomas@rossintelligence.com>, <tara.levin@thomsonreuters.com>, <kelly.phillipson@thomsonreuters.com>, <charles.mikesell@thomsonreuters.com>
Cc:



Sent from my iPhone

On Sep 25, 2015, at 12:34 PM, Thomas Hamilton <thomas@rossintelligence.com> wrote:

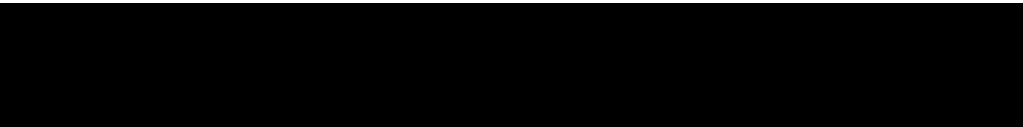


Regards,



On Fri, Sep 25, 2015 at 11:28 AM, <melissa.pritchard@thomsonreuters.com> wrote:

Hello Thomas



Melissa

Sent from my iPhone

On Sep 25, 2015, at 11:09 AM, Thomas Hamilton <thomas@rossintelligence.com> wrote:

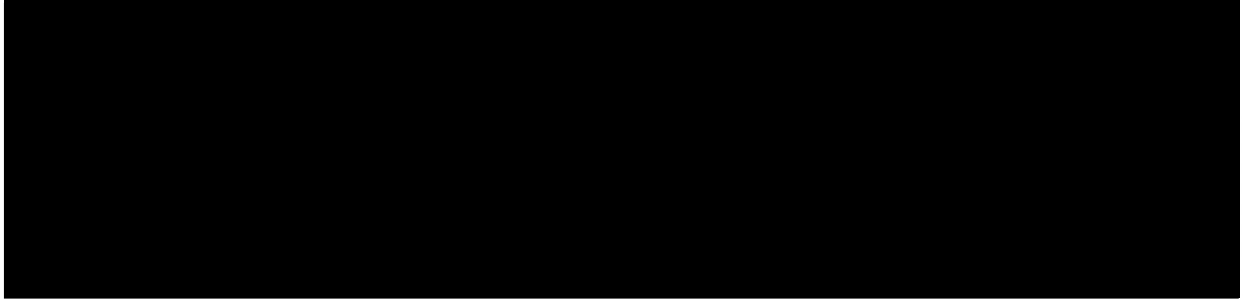
Hi Melissa



Thomas

On Mon, Sep 21, 2015 at 12:42 PM, <melissa.pritchard@thomsonreuters.com> wrote:

Hello Thomas –



Warmest regards,

Melissa Pritchard

Melissa A Pritchard

| Regional Corporate Consultant - Washington, Oregon, Northern California

| **West, A Thomson Reuters Business** | Phone: [503-750-1699](tel:503-750-1699) | Fax: [1-866-531-0221](tel:1-866-531-0221)
Melissa.Pritchard@thomsonreuters.com

Westlaw Help (24/7): 1-800-900-WEST (9378)

<image003.jpg>

--

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Head of Legal Research

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[Website](#) | [LinkedIn](#) | [Twitter](#)

--

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[Website](#) | [LinkedIn](#) | [Twitter](#)

EXHIBIT G

Fwd: Legal Research Inquiry

From: Akash Venkat <akashizzle59@gmail.com>
To: thomas@rossintelligence.com; andrew@rossintelligence.com; jimoh@rossintelligence.com
Date: Mon, 21 Sep 2015 03:29:18 +0000

----- Forwarded message -----

From: **Akash Venkat** <akashizzle59@gmail.com>
Date: Sun, Sep 20, 2015 at 8:24 PM
Subject: Re: Legal Research Inquiry
To: Tariq Hafeez <tariq.hafeez@legaleasesolutions.com>
Cc: contact <Contact@legaleasesolutions.com>, Sales <sales@legaleasesolutions.com>

Best,
Akash

On Sun, Sep 20, 2015 at 8:12 PM, Tariq Hafeez <tariq.hafeez@legaleasesolutions.com> wrote:

Best,
Tariq Hafeez, Esq.
Co-founder/President
LegalEase Solutions LLC
2301 Platt Rd, Suite 20
Ann Arbor, MI 48104
(734) 274-2005 Direct

On Sep 20, 2015, at 10:49 PM, Akash Venkat <akashizzle59@gmail.com> wrote:



Best,
Akash